

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

In Re:

Case No. 11-29064

TODD A. BRUNNER and
SHARON Y. BRUNNER,

Debtors.

Chapter 11

Judge James E. Shapiro

**MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO DISCHARGE OR
DISCHARGEABILITY OF DEBTS**

COMES NOW Federal Deposit Insurance Corporation as Receiver ("FDIC-R") for Legacy Bank, by and through its attorneys, Gonzalez, Saggio and Harlan, L.L.C., and moves this honorable Court to extend the time for filing a complaint objecting to discharge pursuant to 11 U.S.C. § 727(a), and in support of its motion states as follows:

1. The Debtor commenced this case by filing a voluntary Chapter 11 petition on June 5, 2011.
2. Movant believes that there may be grounds to object to the Debtors' discharge.
3. The current deadline for filing complaints to object to discharge has been set for September 20, 2011.
4. At the last 341 meeting for this matter, counsel for the Debtors concluded the meeting early due to a prior engagement.
5. The U.S. Trustee has filed a motion to conduct a 2004 exam of the Debtors.
6. Movant anticipates attending said examination.
7. Movant feels this inquiry may lead to further information relating to the claim of the FDIC-R in this matter.

Drafted by:
Jeannette M. Conrad
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7. Movant requests an extension of time until December 20, 2011 to file a complaint objecting to discharge so that Movant has sufficient time to fully address issues related to the Debtors' discharge and conduct a proper investigation.

WHEREFORE, the FDIC-R prays that the deadline to file a complaint objecting to discharge be extended through and including December 20, 2011, and for such other relief as this Honorable Court may deem appropriate.

Dated: September 20, 2011

Respectfully submitted,

/s/Jeanette M. Conrad

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In Re:

Case No. 11-29064

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Chapter 11

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Judge James E. Shapiro

**NOTICE OF MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO
DISCHARGE OR DISCHARGEABILITY OF DEBTS**

Federal Deposit Insurance Corporation as Receiver ("FDIC-R") for Legacy Bank has filed papers with the Court to seek an extension of time to file objections to discharge or dischargeability of debts.

Your rights may be affected. *You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).*

If you do not want the Court to grant relief sought in the Motion as to Creditor, FDIC-R, or if you want the Court to consider your views on the Motion, within fourteen (14) days of the date of this Notice, you or your attorney must:

File with the Court a written response or an answer and request for a hearing, explaining your position at:¹

United States Bankruptcy Court, 517 E. Wisconsin Ave, Room 126, Milwaukee, WI 53202

If you mail your response to the Court for filing, you must mail it early enough so the court **receives** it within fourteen (14) days of this Notice.

You must also mail a copy to:

Creditor's Attorney: Jeannette M. Conrad, Gonzalez, Saggio and Harlan, L.L.C., Two Prudential Plaza, 180 N. Stetson Ave., Ste. 4525, Chicago, IL 60601

Debtors' Attorney: Jonathan V. Goodman, Law Offices of Jonathan V. Goodman, 788 N. Jefferson St., Ste. 707, Milwaukee, WI 53202-3739)

¹ Response or answer must comply with F. R. Civ. P. 8(b), (c) and (e)

Drafted by:

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U.S. Trustee: Debra L. Schneider, U.S. Trustee, 517 E. Wisconsin Ave., Rm. 430, Milwaukee, WI 53202

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: September 20, 2011

/s/ Jeannette M. Conrad
Jeannette M. Conrad
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Attorneys for Creditor FDIC, as Receiver
for Legacy Bank

CERTIFICATE OF SERVICE

The undersigned certifies that he caused to be filed a Motion for Extension of Time to file Objections to Discharge or Dischargeability, with notice, in the above-captioned action with the Clerk of Court using the ECF system which will send notification of such filing to all counsel and parties of record.

The undersigned further certifies that he served a copy of said documents by mailing a copy to the party named below by depositing the same in the U.S. Mail, with postage prepaid, on September 20, 2011:

Todd A. and Sharon Brunner
N39 W27051 Glacier Rd.
Pewaukee, WI 53072-2328

Date: September 20, 2011

/s/ Jeannette M. Conrad
Jeannette M. Conrad
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